

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

DEAGO BUCK,

Plaintiff

v.

GOYIM DEFENSE LEAGUE, et al.,

Defendants

3:25-cv-677

JURY DEMAND

Judge Richardson
Judge Newbern

LOUIE DUNN'S MOTION TO DISMISS FOR LACK OF JURISDICTION

Defendant Louis Dunn moves to dismiss the Complaint under Fed. R. Civ. P. 12(b)(6) for failure to state a claim in Counts 1-2, as well for lack of subject-matter jurisdiction under 12(b)(1) once the federal claims are dismissed. For lengthier argument, the Defendant joins onto the Memorandum of Law already filed by the other Defendants, at Record Entry 23.

But put simply, the basis for the motion is that statutes 42 U.S.C. §§ 1985 and 1986 only allow for a federal tort if defendants have either (1) sought to utilize or influence the government to take away a federal right, or else (2) sought to take away a federal right that applies even to private conduct. *Volunteer Medical Clinic, Inc. v. Operation Rescue*, 948 F.2d 218, 226-28 (6th Cir. 1991). Since here the Complaint merely alleges that the Defendants conspired to harass or get into fights

with black people, it alleges immoral and discriminatory conduct but fails to charge any violation of a federal right. Therefore, it fails to state a federal claim.

And once the federal claim is dismissed, the Court will lack subject-matter jurisdiction. *See Musson Theatrical, Inc. v. Federal Express Corp.*, 89 F.3d 1244, 1254-55 (6th Cir. 1996).

WHEREFORE, the Complaint should be dismissed for failure to state a federal claim, and for lack of jurisdiction over the state claims — with leave to re-file the state claims in state court if desired.

Respectfully submitted,

/s/ Drew Justice
Drew Justice #29247
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Certificate of Service

The undersigned lawyer certifies that this August 13, 2025, he has delivered this motion via ECF to Ben Raybin, 424 Church Street, Suite 2120, Nashville, TN 37219 <braybin@nashvilletnlaw.com>.

/s/ Drew Justice
Drew Justice #29247